UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF FLORIDA

NANCY McLEAN and JOHN McLEAN, her son, Plaintiffs, vs. THE CHURCH OF SCIENTOLOGY OF CALIFORNIA, et al., Defendants.	81-174-Civ. T-K

VOLUME II

DEPOSITION OF GERALD ARMSTRONG, taken on behalf of Defendant THE CHURCH OF SCIENTOLOGY OF CALIFORNIA, at 9:02 A.M., Wednesday, February 9, 1983, before RUTH PERSKY, CSR #5673, a Notary Public in and for the County of Los Angeles, State of California, pursuant to Subpoena re Deposition.

Reported by: Ruth Persky, CSR #5673

Deposition No.: 83-067

APPEARANCES:

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-and-

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KEN LONG

I N D E X

EXAMINATION

BY MR. JOHNSON: Pages 181, 245
BY MR. LOGAN: Pages 225, 247
BY MR. MAGNUSON: Page 247

EXHIBITS

(None)

SANTA ANA, CALIFORNIA, WEDNESDAY, FEBRUARY 9, 1983

9:02 A.M.

GERALD ARMSTRONG

called as a witness on behalf of Plaintiff, having previously been first duly sworn, was examined and testified as follows:

EXAMINATION RESUMED

BY MR. JOHNSON:

+ Q. Mr. Armstrong we're continuing our deposition from yesterday. You understand that you are still under oath?

A. Yes.

Q. May I ask you who all you have talked to concerning this deposition that we are taking today and took yesterday.

MR. LOGAN: Are you talking about since termination yesterday?

BY MR. JOHNSON:

Q. No. Initially, in anticipation from the time you received notice or were aware your deposition was going to be taken, who have you talked to from that time until the present moment?

Q. Mr. Logan. You mean who have I talked to since I originally learned about it?

Q. Concerning --

Q. Producer?

A. Yeah.

Q. And did he have a connection with the "20/20" program?

A. Yeah.

Q. When you had the meeting at the Hotel Bonaventure in June or July of 1982, was the subject of your appearing on a television program discussed with Gordon Freedman?

A. Yeah.

Q. And how long after that did you have further discussion with either him or Mr. Flynn concerning your appearing on the "20/20" program?

A. Mr. Freedman called me a couple of times subsequent to that, and then possibly a month after that we met and filmed the interview.

Q. And where did the filming take place?

A. A hotel in Westwood, I think it is.

Q. Where is Westwood?

A. It's in the western part of Los Angeles.

MR. LOGAN: The Wizard of Westwood, John Wooden, UCLA?

MR. JOHNSON: I'm not familiar.

Q. Were you a compensated for your interview on "20/20"?

MR. LOGAN: Just in passing, I object to the relevancy of this area of inquiry.

THE WITNESS: How do you mean compensated? Did I enjoy it? Do I feel that my security was enhanced? Was it an educational experience? It was all those things. So in that sense I was compensated.

Was that what you had in mind?

BY MR. JOHNSON:

Q. What I really had in mind, were you paid any money?

A. No.

Q. It was a voluntary appearance made by you gratuitously?

A. Yeah.

Q. You also mentioned another meeting yesterday that you had with Mr. Flynn which occurred in Long Island, New York, and you named a number of persons who appeared at that meeting in a hotel whose name you could not recall. You stated yesterday that you secured assistance from the persons present. And I'd like to question you further about that, please.

A. What was that again?

Q. My notes say that you secured assistance or obtained assistance from the people present in the meeting in Long Island at which Mr. Flynn appeared -- Ron DeWolf, Gail O'Neill, George O'Neill, Abby O'Neill, and Bruce Bunch, and your wife Jocelyn Armstrong. And my notes are that you obtained assistance.

A. Perhaps we could have the court reporter read it back because I do not recall saying that I obtained any assistance. Perhaps you misconstrued that. I offered assistance.

Q. To those individuals?

A. Yeah.

Q. Not to belabor it, what assistance did you offer to Ron DeWolf?

A. The only assistance I offered was the support that I could give in withstanding the attacks.

Q. And what support did you offer Ron DeWolf?

A. Support?

Q. Yes, sir.

A. Support is support.

Q. Well, how were you to support him?

A. Support is support.

Q. See, I don't know what you mean by the word "support."

A. Well, let's put it this way. I would not try and stomp him out.

Q. Did you offer any specific manner in which you could assist Ron DeWolf in his continuing fight against the Church of Scientology?

A. I don't know of a continuing fight against the Church of Scientoloy; however, I offered him support.

Q. You said the purpose of the meetings was to exchange ideas and information about the ongoing litigation. Do you recall that?

A. About ongoing litigation, about the organization, and more particularly about my personal experiences.

Q. Is your testimony, then, that you offered no specific assistance to Ron DeWolf except just moral support?

A. That's right. It's the same kind of support I would offer to the organization of Scientology.

Q. Have you made such an offer to the organization of Scientology?

A. For years.

Q. Have you done it recently?

A. I offer it now.

Q. What do you have in mind?

A. That I will support them in their honest ethical endeavors.

Q. Okay. You mentioned Gail O'Neill. Who is Gail O'Neill?

A. She's the daughter of Abby and George O'Neill.

Q. What is her approximate age?

A. 20, maybe 25.

Q. What assistance did you offer to Gail O'Neill?

A. I only said that if I can be of help by relating my experiences, and if they're of some worth, then I would have been of assistance.

Q. Is Gail O'Neill a Scientologist?

A. I think so.

Q. What assistance did you offer George O'Neill?

A. The same thing I offered to Gail.

Q. Was George O'Neill a Scientologist?

A. That's a difficult question to answer. I don't know. He would not call himself a Scientologist, and she might. So if that's the designation that we're using, then, yes, she was; but, no, he wasn't.

Q. Do you know what his business was?

A. The only business I know that he had was a salmon farm in Scotland.

Q. What assistance did you offer to Abby O'Neill?

A. The same thing that I offered to the others.

Q. Do you know if she's employed outside the home?

A. I -- I'm pretty sure. My understanding is she's involved in the Rockefeller corporations.

Q. In what manner? Is she related to the Rockefellers?

A. Yes.

Q. What assistance did you offer to Bruce Bunch?

A. Bruce Bunch is my attorney.

Q. Is he of Contos & Bunch here in Los Angeles?

A. Uh-huh.

Q. Did he travel to Long Island with you for this meeting?

A. You have to be more explicit than that. He did not travel from Los Angeles with me. He was, I believe, in New York on business.

Q. And another item that you testified

yesterday, you said you had a letter from Pat Brice to Mary Sue Hubbard, outlining information about letters written to Ron DeWolf from 1967 through 1971, purportedly signed by L. Ron Hubbard, but actually signed by other persons. And yesterday you told me that you had turned this over to the Superior Court of Los Angeles.

Can you tell me how you turned it over to the court? Did you do it personally, or did you do it through someone else?

A. No. The original of that letter I said was in L. Ron Hubbard Archives and remained in L. Ron Archives where, unless it's been destroyed, it still is. The -- I personally took no documents into the Superior Court. All the documents which I had in my possession I sent to either of my attorneys, and they turned them over to the Los Angeles Superior Court.

Q. That would be Mr. Bunch or who else?

A. And Mr. Flynn.

Q. You don't recall who it was, Mr. Bunch or Mr. Flynn, who you sent it to?

A. I believe Mr. Flynn had that document.

Q. That's the copy of the letter from Pat Brice to Mary Sue Hubbard which you were talking about?

A. Yes.

Q. Turning back to your affidavit which is the subject of this deposition -- would you like to borrow my copy again?

A. I can look on here.

MR. JOHNSON: Would you mind giving me my last question of last time. It was about Paragraph 12.

(Record Read.)

BY MR. JOHNSON:

Q. Could we address Paragraph 13 of your affidavit, please?

A. Yeah.

Q. Your first sentence says that the various steps for the renovation of Gilman Hot Springs were all ordered by Mr. Hubbard. In what way were they ordered by him?

A. He laid out what he wanted done with the house.

Q. Was it a written order or verbal order or communicated to you directly?

A. It came to me via Kima Douglas.

Q. Was it in writing or verbally?

A. It was -- there were items in writing on the subject, and there was verbal communications.

Q. Were there writings in Mr. Hubbard's handwriting?

A. Yes.

Q. And what items were in his handwriting? Can you describe them?

A. These were approvals on the project to be done.

Q. Can you tell me specifically what part he approved in writing?

A. He approved the budget; and he ordered the decor; he ordered the color scheme; he ordered tiling of the floor. That sort of thing. There were many orders, many written orders from Mr. Hubbard on the renovation of the house at Gilman Hot Springs, and the decor and decorations and exterior work.

Q. Do you know where those written orders are today?

A. I believe most of them were destroyed. They were ordered destroyed.

Q. You do not have copies of any of them?

A. No.

Q. In paragraph 13 you have a rather detailed list of renovations. Is that all from your memory that you recalled when you sat down and wrote out this affidavit in four or five hours just prior to October 19th, 1982?

A. Yeah.

Q. Did you use any resource materials in order to assist you in outlining the items in Paragraph 13.

A. No.

Q. You talked to Kima Douglas about what was done to the house at Gilman Hot Springs?

A. No.

Q. What was her position at that time?

A. She was the Commanding Officer of the Household Unit.

Q. Was she in effect supervising your work on the renovations?

A. By which you mean was she an on-site person always there observing what was going on? In that sense of supervising, no. Was she senior, or did she have a function as a relay of communications from L. Ron Hubbard, and did she have an overview of it? Yes.

Q. Since you wrote Paragraph 13, have you recalled any errors in your statement in Paragraph 13?

A. Do you you want me to review it now?

Q. Surely.

A. Okay.

(Off the record.)

THE WITNESS: So I've reviewed this and it's okay.

BY MR. JOHNSON:

Q. Since you have written this affidavit, have you thought of any other items of renovation that were done at Gilman Hot Springs?

A. That's a different question. Have I thought of any other items? Well, I could relook at it with that viewpoint.

Well, he ordered Dacron on all the windows; he ordered a mildew smell be located; and I got approved the ripping out of a shower, a stall, and reinstallation of another one.

Q. Now you are not confusing --

A. There was a mantel piece which was built which is not included in this list --

Q. You are not confusing your mildew work at La

Quinta with your mildew work at Gilman Hot Springs, are you?

A. Hold on. Aren't we talking about Gilman Hot Springs?

Q. Yes.

A. And where did you see mildew work at La Quinta?

Q. Have you previously stated that you made some changes to La Quinta because of mildew?

A. Not to my recollection.

Q. The only place that you found or were required to make any changes for mildew was at Gilman Hot Springs?

A. Yes.

Q. Okay. Anything else?

A. Reupholstering of some furniture. He came to Gilman Hot Springs and found that one of the chairs wasn't wide enough, and we built another chair and reupholstered it.

Q. Anything else?

A. That's all I can think of for now.

Q. Do you know Leo Johnson?

A. Yep.

A. Who is Leo Johnson?

A. Leo Johnson is a man who was at La Quinta and Gilman Hot Springs.

Q. Do you know Lola Rossouw.

A. Yes.

Q. Who is Lola Rossouw?

A. Likewise a person who was at Gilman Hot Springs, and she was for a period of time my senior at Gilman Hot Springs.

Q. Were both Leo Johnson and Lola Rossouw your seniors in the renovations at Gilman Hot Springs?

A. No.

Q. In what relationship was Lola Rossouw your senior?

A. Lola Rossouw was my senior during a period of that time while the renovations were going on. She was not at the beginning of the renovations period. Leo Johnson was never my renovations senior.

Q. Were they both involved with renovations at Gilman Hot Springs?

A. Yes.

Q. All right. Let's go to Paragraph 14. Here again the details that you have outlined in Paragraph 14 -- was that solely from your memory that you had when you wrote the affidavit and not based upon any writings or documents or conversations with other people?

A. That's correct.

Q. You mentioned office spaces for Mr. Hubbard and Mrs. Hubbard in Paragraph 14. Did they ever occupy and use these office spaces?

A. They were set up for them and their office equipment. Office furniture and that sort of thing occupied the spaces, but they were never used as offices by either Mr. or Mrs. Hubbard, to my recollection.

Q. May we go to Paragraph 15.

(Off the record.)

BY MR. JOHNSON:

Q. Now you have described some things that had occurred in '79 and '80, but here again you were in the RPF during much of this time, were you not?

A. No.

Q. Were you in the RPF from August of '78 to April of '79?

04

A. Yeah, about then, March or April. Does "much" mean more than half? Or does "much" mean a tiny portion?

Q. Well, you have alleged here that during all of 1979 Mr. Hubbard lived in Hemet, and I was trying to learn if you in fact were assigned to the RPF for the first four months of 1979. That's my question.

A. Approximately, yeah.

Q. And where were you assigned to the RPF?

A. In Gilman Hot Springs.

Q. Did you have occasion to go to Hemet during your duties with the RPF?

A. Yes.

Q. You said earlier that you were going to Gilman Hot Springs on a daily basis. Were you going to Hemet on a daily basis?

A. I don't believe that I ever said I went to Gilman on a daily basis. I lived at Gilman Hot Springs.

Q. Well, you were not seeing Mr. Hubbard on a daily basis for the first four months of 1979, were you?

A. No.

Q. So this statement is not based upon your own personal knowledge -- that's Paragraph 15 -- about all of '79 Mr. Hubbard lived in Hemet?

A. No. It's based on what I was told and what I knew and the fact that I had liaison with the staff who lived with him during that period at that time.

Q. In other words you are basing it on hearsay statements by other people; is that right?

A. That's basically it.

Q. Now, you also state in Paragraph 15 "it" -- this word "it" you like so well -- "was considered unsafe for him to live on the property, his cover having been blown." Who is "it"?

A. It was announced to the staff.

Q. Were you part of his staff?

A. Yeah.

Q. And what was your usual function with his staff?

A. I was in charge of the Household Unit at Gilman Hot Springs, and I was in charge of the LRH Renovation Unit during part of that time.

Q. Well, you say it was considered unsafe. Is that based upon what someone else told you?

A. Yes. It was announced to all the crew.

Q. By whom?

A. There were announcements made by the CMO, Diana Reisdorf, Diana Voegeding, by Gary Wiese, by Laurel Sullivan -- then I think she was Laurel. It may have been Laurel Sullivan -- Doreen Gillham.

Q. Each of those persons announced to you that it was considered unsafe for Mr. Hubbard to live on the property, his cover having been blown?

A. And Kima Douglas and Lola Rossouw.

Q. Did Mr. Hubbard ever discuss this subject with you?

A. No.

Q. In Paragraph 17, Mr. Armstrong, you use as an example that Mr. Hubbard ordered a serving table to be built for the dining room. Did you know for a fact whether it was Mr. Hubbard or Kima Douglas that ordered the serving table to be built for the dining room?

A. I was told Mr. Hubbard ordered it.

Q. By whom?

A. I believe it was Kima -- let me correct that.

Q. Excuse me.

A. I believe I got it from -- the first mention of it came from Paco Suarez, and it was confirmed with Kima.

Q. You described Paco Suarez as being a cook or --

A. Yeah.

Q. All right. When you say "serving," that was to be used in food such as Paco would be concerned with?

A. Yeah.

Q. Let's turn to Paragraph 18. Here again in Paragraph 18 you said the La Quinta property was abandoned or sold because it was blown. That's your conclusion, is it not?

A. I suppose it was everyone's conclusion. Perhaps we were all duped or deluded, but that was what everyone was informed of.

Q. You mention in Paragraph 22 plans drafted by Barry Stein. Were those plans ever put into effect in a house built to the plans, to your knowledge?

A. I don't know.

Q. In Paragraph 25 you mention an office to be constructed for Mr. Hubbard in a movie studio on the Gilman Hot Springs property. Was that office completed?

A. I don't know. I was told at the end of 1981 that it was almost complete.

Q. Did Mr. Hubbard ever occupy that office?

A. I don't know.

Q. Turn to Paragraph 26. Here again you use the word "fled." What do you mean by that?

A. That -- left suddenly, motivated by fear.

Q. Where were you in March of 1980 when Mr. Hubbard "fled", as you say?

A. In Los Angeles.

Q. How far is that from Hemet?

A. Oh, 100 miles.

Q. And what were you doing in Los Angeles?

A. I was working on the biography project.

Q. I take it, then, by your answer that you were not present when Mr. Hubbard left Hemet?

A. No.

05 Q. You did not see him pack? You did not see by what means of transportation he left?

A. No.

Q. So when you say "fled," that's a conclusion on your part?

A. Yeah.

Q. Now, to what other location in Southern California did Mr. Hubbard go to when he left Hemet?

A. I don't know.

Q. And here again when you say he left for another location which you do not know, it was again determined that his whereabouts might be known by authorities, to be serviced a summons or subpoena.

What was the basis for that statement, that "it" statement?

A. I was briefed on this by Laurel Sullivan; I heard interviews that were done of Diana Voegeding and Gail Irwin; I attended a briefing that Laurel gave to Guardian Office staff; I had discussions with people throughout that period including Lola Rossouw.

Q. Did you ever talk to Mr. Hubbard about it?

A. No.

Q. So anything you said here is based on hearsay statements from other people?

A. Yeah, based upon statements from other people.

Q. Now, you have described that his staff from Hemet returned to Gilman Hot Springs. Were you either at Hemet or Gilman Hot Springs when his staff returned, as you have stated?

A. I saw them many times out at Gilman Hot Springs.

Q. I'm not talking about after Mr. Hubbard left Hemet to a unknown location in Southern California. Did you have an occasion to go to Hemet or Gilman? And, if so, please tell me when.

A. Yes, many times throughout 1980.

Q. For what purpose?

A. I still had my clothing out there. I had a liaison which existed between the CMO which were --

Q. That's Kima Douglas?

A. CMO?

Q. Is that Kima Douglas?

A. No. Commodore's Messenger Organization, which throughout the latter part of 1980 was headquartered at Gilman Hot Springs and with the CMO SU which was headquartered at Gilman Hot Springs.

Q. What is the CMO SU?

A. That's the Commodore's Messenger Organization. SU, Special Unit.

Q. And who was in the Special Unit?

A. The Special Unit was like a lot of things in Scientology, has a number of meanings designed to trick both the inside and outside populace.

SU referred to the geographical location, the complex itself; and SU also referred to a differentiation made between those organizations on that property which had to do with the property itself or organizations on the property, and organizations on the property which were -- which had to do with international management from the property, for example, CMO International and CMO SU.

CMO SU was in charge directly of organizations at SU at that geographical location. CMO International, although senior to CMO SU, had a responsibility overseeing all organizations internationally.

Q. You were talking in your affidavit in Paragraph 26 about ten people, members of Mr. Hubbard's staff, who came from the Hemet to Gilman Hot Springs. Who were those ten people?

A. David Mayo, John Brousseau, Clarisse Brousseau, Doug Holmes. Let me see. There was an AV, audio visual person -- I forget his name -- Lola Rossouw, Paco, David Lance. Those are the names I remember right now.

Q. That's nine names. Was there another?

A. Oh, I'm sure there was more. Maybe one of those wasn't there, but may have been there earlier, but there was a group -- the Brousseaus, Lance, Lola -- all of whom I observed throughout that -- many times in the period of 1980.

Q. During the many times in 1980 that you left Los Angeles and came back to Gilman Hot Springs, what was your occasion of visiting with the ten people on Mr. Hubbard's staff that you have described in Paragraph 26?

A. I had business out in Gilman Hot Springs, and I saw them there. They ate meals there; I ate meals there.

Q. Your business was with those ten persons?

A. I had business with Lola, who was part of the ten persons, and I visited with Lola. I visited with Lola probably half the times that I came down to Gilman Hot Springs.

Q. Their identities were not secret, were they?

A. What do you mean?

Q. You alleged here that they carried out a bizarre scheme to keep their identities secret. Their identities certainly were not secret, were they?

A. Yes, they carried out a bizarre scheme. I knew these people --

Q. Well, you knew who they were. They weren't secret. How could they keep you from knowing who they were and recognizing them?

A. Did you read what I wrote?

Q. I read it and I'm curious about how you can say they had a bizarre scheme to keep their identities secret if their identities were known to many people.

A. Did you recognize the word "outsiders" there? They were never visible to outsiders.

There was a period of time before it became obvious that -- the period of time was so great that Mr. Hubbard was probably not going to pitch up in the next little while that they were integrated into the local staff. But there was a period of time in which these people -- they wore hats which covered their face and they traveled in a van going across the road to eat, and I observed that fact.

Q. Well, how many outsiders were allowed on the Gilman Hot Springs property?

A. By which you mean how many outsiders could travel down the highway which runs through the middle of the property?

Q. No. I mean outsiders that would travel between the buildings on the Gilman Hot Springs property?

A. I didn't say outsiders travelled between the buildings.

Q. Well, Mr. Armstrong, reading this affidavit here, you said they had this bizarre scheme --

A. The outsiders?

Q. No. Let me finish.

That the ten persons on the staff had the bizarre scheme that when they traveled between the buildings they wore disguises and were in a blackout van. Now, aren't you exaggerating somewhat?

A. No.

Q. Why would they want to travel in bizarre disguises from one building to another when their identities were known by the people there at Gilman?

A. You will notice that I used the word "outsiders." The purpose -- and I was told this by Lola -- was so that they would not be identified among the other Gilman Hot Springs crew; and so, therefore, when L. Ron Hubbard relocated in another permanent residence, they would be able to go to him and still maintain the security which they had before.

If, however, they were photographed by the press or the authorities that Scientology imagined was tracking them or photographing them or following them, then the security would be blown, and they would be denied the opportunity of again being with L. Ron Hubbard. That was the rationale behind this bizarre act.

Q. Going back to my question about your having outsiders, is it your testimony there were outsiders and press that were in between the buildings on the Gilman Hot Springs property?

A. Let me ask you a question first. Have you ever been to the property?

Q. No.

A. Okay. There is a highway which runs through the middle of the property.

Q. Is there more than one building on each side of the highway?

A. Yep.

Q. Now, in your last clause you said, "and they traveled even when only going between buildings on the Gilman Hot Springs property in the black top van."

A. Yep.

Q. Are you suggesting that they did that to avoid outsiders that were present on the property?

A. I'm not suggesting that at all. People came to the Gilman Hot Springs property. They, the organization, had a fear of the press, television, camera people, the FBI, the CIA, all sorts of other groups.

Now, the property is not an island onto itself. It is surrounded by other properties. Through the middle of the property drives a highway, and simply when crossing this road, I saw these people travel in a van.

The whole thing was -- it was ridiculed to me by Leo Johnson. He thought it was the most bizarre scheme possible. But I observed the scheme.

Q. And you observed them going between buildings on the same side of the road, traveling in bizarre disguises in a blackout van? Is that your testimony?

A. Is that what you are trying to get me to say?

Q. It seems incredible if that is your testimony. I'm trying to learn what your testimony is.

A. I'm telling you when I saw them go from their work area, from the villas 200 yards away in a blacked-out van, and riding around the property wearing hats pulled down over their faces -- Lola described to me why.

Everyone on the property knew that was why. It's the simplicity of it.

Q. What disguises did they wear. Did they wear some kind of funny faces or anything of that sort?

Q. You see your word "disguises." Describe these disguises that they were wearing.

A. They -- I don't know of any funny faces. But they had like cowboy outfits on, and they had hats which came down over their faces.

Q. However, identity of this X staff was known to many people, was it not?

A. Yes.

Q. How many people were on staff at Gilman Hot Springs at the time you described this scheme to keep their identities secret?

A. Probably 200.

Q. Would it be fair to say that all the Scientologists on staff at Gilman Hot Springs knew who was on the X staff.

MR. LOGAN: I object to the form. Calls for speculation as to what 200 people might or might not know collectively.

BY MR. JOHNSON:

Q. Would you answer the question?

A. My guess is that a lot of the 200 would not know. A lot of the 200 would not have any clue that Mr. Hubbard was in the area at all. That was kept very, very secret. Even when Mr. Hubbard arrived in his own blacked-out van to the property, the security guards were not even supposed to know.

So the existence of these other people as the X staff I don't -- I don't think was known by all the people present.

Q. How many of the 200 people on the staff at Gilman Hot Springs knew the identity of the X staff you have described here in Paragraph 26?

A. You mean knew that they were the X staff?

Q. Knew who they were.

A. 50.

Q. Starting at Paragraph 27. Here again you state in your first sentence: "When Mr. Hubbard and the Broekers left Hemet, they moved to another Southern California location."

What was the other Southern California location?

A. I don't know.

Q. Where was it located?

A. I don't know.

Q. You've alleged that Pat Broeker could and did quite often on very little notice show up in the Los Angeles area to handle some business. Who gave her notice to show up in Los Angeles?

A. It's a "he," and this came to me from Mike Smith and Vickie Livingston.

Q. Were you ever present when notice was given to Pat Broeker?

A. No.

Q. Were you ever present when Pat Broeker showed up in the Los Angeles area?

A. No.

Q. Did you ever see Pat Broeker show up in the Los Angeles area?

A. No.

Q. This is based purely on what someone else told you?

A. Yep. What I was briefed on by Laurel Sullivan who was LRH's Personal Public Relations Officer.

Q. And when you describe the nature of the business as being financial business with Mr. Hubbard's personal account staff, you knew that of your own personal knowledge?

A. I know that those were the people who were handling LRH's financial business, so they had the connection.

Q. Who were the people?

A. The people I named, Mike Smith, Vickie Livingston.

Q. And they told you the nature of their business with Pat Broeker?

A. They just said that -- that they had a line to Pat Broeker, and that he could show up -- I mean that he did show up, and it was financial business.

Q. So your statement here that there was financial business with Mr. Hubbard's personal accounts staff, that's based on what someone else told you; is that right?

A. Laurel Sullivan.

Q. Well, Laurel Sullivan is someone else.

A. Well, okay.

Q. And in your next sentence: "It was known among Mr. Hubbard's personal staff of which I was a part --" you were not a part of Mr. Hubbard's personal office staff, were you?

A. Yeah.

Q. What was your assignment?

A. I was -- my post organizationally was LRH Personal Public Relations Officer Researcher, and I was in the personal office of L. Ron Hubbard.

Q. By being in the personal office of L. Ron Hubbard, what do you mean?

A. That means that I was in the personal office of L. Ron Hubbard.

Q. Well, there's a difference between being in the personal office of L. Ron Hubbard and being his personal office staff, is there not?

A. What's the difference?

Q. Quite a bit. Did you have contact with L. Ron Hubbard after he left Hemet? Tell me the occasions on which you had contact with him after he left Hemet.

A. I didn't have any. Are you trying to tell me that I was duped?

Q. I'm trying to tell you that what you have stated in your affidavit is not based upon what you knew personally.

A. I'm trying to tell you that I was a part of the personal office staff of L. Ron Hubbard.

Q. But you had no direct contact with L. Ron Hubbard?

A. No.

Q. And you say it was known -- here again you use the word "it" -- among the personal office staff that David Miscavige was Mr. Hubbard's contact with all Scientology organizations.

What was your contact with Mr. David Miscavige?

A. I saw him on occasions; I received communications which came via David Miscavige; I was informed by Laurel Sullivan that David Miscavige was -- had a line of communication to L. Ron Hubbard; and also by Diane Voegeding and Gail Irwin.

Q. Your statement that David Miscavige was the main contact to all Scientology organizations for Mr. Hubbard -- that's a conclusion on your part; isn't it?

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A. No. I think it's -- the only other possibility would be that he isn't, that --

Q. That's the reason I suggested it's a conclusion on your part; isn't it?

A. Okay.

Q. Would you agree?

A. Uh-huh.

Q. "Uh-huh" means "yes"?

A. Yes.

Q. And your statement that Mr. Miscavige relayed communications to Mr. Hubbard and the Broekers and received Mr. Hubbard's communications and orders for implementation -- that's also a conclusion on your part; isn't it?

A. It's what I was told.

Q. But not by Mr. Miscavige or Mr. Hubbard or Mr. Broeker?

A. No.

Q. Let's turn to 28.

Are you what is described as a disaffected Scientologist?

A. You'd have to describe that to me.

Q. You are not familiar with the word?

A. I've heard it used. I have never called myself that. Does that mean I'm still a Scientologist but in disagreement with some of the actions or products of the current power clique? Is that what you mean?

Q. Well, let's use that as as definition to begin with.

A. Go with that.

Q. With that definition, would you be a disaffected Scientologist?

A. I would be a Scientologist who is in disagreement with the -- some of the actions of the current power clique, yes.

Q. How long have you been in disagreement with the actions of the current power clique?

A. I guess at various times throughout 1980 onwards.

Q. When did you terminate your relationship with the organization of the Church of Scientology?

A. I left the premises in December 1981.

Q. Did you do what they call "routing out"?

A. Nope.

Q. Did you leave under circumstances which are described as "blowing"?

A. Yep.

Q. Did you discuss with Mr. Flynn Paragraph 28 about your understanding of where Mr. Hubbard still resides and intends to continue to reside?

A. He may have asked me, "Where do you think he is? Where do you think --" you know "-- he intended to go when he left Hemet?" He may have.

Q. The reason I asked that question, Mr. Armstrong, this seems to be a very legalistic statement to support the position the plaintiffs are taking in this case, and I'd like to know the basis of your understanding that Mr. Hubbard is still residing in and intends to continue to reside in Southern California?

A. Well, I think I've laid it out there in that -- in that the organization out at Gilman Hot Springs continued to ready these office spaces for Mr. Hubbard and in fact renewed all the projects to get the office spaces ready for when the all-clear date occurred. Certainly it was considerable evidence to me that he intended to come back there.

Q. And that statement is the basis for your conclusion, of your understanding in your first sentence in Paragraph 28?

A. What I've been told and these things that I observed.

Q. Well, what's the basis of your understanding that Mr. Hubbard is residing in Southern California?

A. Just the fact that Pat Broeker could show up within a couple of hours' notice and the fact that --

Q. That's based upon what you have been told by someone, that Pat Broeker could show up on short notice?

A. Yep.

Q. Do you know anything about the airline schedules into Los Angeles International Airport?

A. No.

Q. So your assumption that Pat Broeker is in Southern California springs from what you said someone told you, that he could show up on short notice, and, further, upon your assumption that where he is, Mr. Hubbard must also be? Is that the basis of your understanding that Mr. Hubbard is residing in Southern California?

A. Yes.

Q. Tell me about the mission composed of CMO members sent by Mr. Hubbard to resolve his legal problems and give the order to establish an all-clear date. Who is this mission composed? Of CMO members?

A. Well, it was a mission in 1981 who composed at that time of -- headed by Terri Gamboa and Norman Starkey.

Q. Was Norman Starkey a CMO member?

A. I was told he was.

Q. Is that in fact true?

A. I was told he was. I've never seen any contracts. I was told he was.

Q. Let's explore that much. Have you ever seen anything of your own personal knowledge to convince you that Norman Starkey was or ever has been a member of the CMO?

A. Yes.

Q. What is that, sir?

A. Documents saying that he was a CMO Missionaire, documents either written by him or referring to him from within the CMO. If he is not a CMO member, then it was my understanding that he was a CMO member, and it was certainly -- he was certainly represented as a CMO Missionaire.

Q. That's the purpose of my questions. I want to know what you know of your own personal knowledge, not what someone else has told you. And that's the reason why I must ask you these questions. I'm asking if you know of your own personal knowledge.

You have alleged that he is a CMO member. I would like to know if you know that of your own personal knowledge.

A. Well, on that basis I don't know any CMO members, then. I don't know if there are any CMO members.

Q. Well, do they wear uniforms on occasion?

A. So does Mr. Starkey.

Q. You are talking about Norman Starkey, not his brother, now?

A. Yes, Norman Starkey.

Q. Does anyone wear uniforms other than CMO members?

A. Yes.

Q. Sea Org members wear uniforms, do they?

A. Yes.

Q. Is there a distinction between uniforms worn by CMO and those by Sea Org?

A. There may or may not be.

Q. Do you know of any?

A. Maybe in lanyard type.

Q. Have you ever seen anything where Mr. Starkey was in uniform to indicate he was a CMO member?

A. Yeah. I mean he was with the CMO, and my understanding was --

Now if that's a problem with you, then I can say a mission composed of a CMO member and a person whom I understand to be a CMO member and operated by a CMO member. How about that?

Q. Well, my problem I have with that, I want to know what you know of your own personal knowledge, and it appears that much of what you are telling me is what someone else has told you, and that's why I'm asking these questions.

A. Well, everyone within the organization had a particular post, and I never saw -- no one came with an issue attached to them or a label saying I'm a this or I'm a that. It was --

I was told it was a CMO member. I was told Norman Starkey was in the CMO at some point. If he wasn't, I'm fine with that; I really am.

Q. Well, did you see an order sent by Mr. Hubbard in 1981 to the CMO to resolve his legal problems? Did you see such an order?

A. No. I was briefed on it by Laurel Sullivan.

Q. It appears that much of what you put in your affidavit comes from Laurel Sullivan. Would that be a fair statement?

A. Laurel Sullivan was my senior throughout a great deal of my time. Laurel Sullivan was L. Ron Hubbard's Public Relations Officer, so we had a great deal of contact organizationally. We spent a great deal of time together.

Q. Is Laurel Sullivan still affiliated with the Church of Scientology?

A. I don't know to what degree.

Q. When was the last time you talked with Laurel Sullivan?

A. Two months ago.

Q. What was the occasion you were talking to Laurel Sullivan two months ago?

A. I called her.

Q. For what purpose?

A. We talked about Scientology; we talked about -- we talked about est.

Q. Excuse me. I didn't hear your last words.

A. "est," e-s-t. Little "e", little "s", little "t."

We're friends. I called her to find out if -- if my brother had been around to see her. I gave my brother her name and number.

Q. All right. Did you talk to Laurel Sullivan in preparation for preparing this affidavit signed by you in October 19, 1982?

A. No.

Q. How many times have you talked to Laurel Sullivan since you blew the organization?

A. Four or five.

Q. You talked to her after you left the organization of Scientology and before you wrote this affidavit about some of the subjects which you have written in your affidavit, did you not?

A. We undoubtedly touched on the subject of Scientology and certainly the subject of Mr. Hubbard. Now as far as any of the details in here are concerned, I don't think so.

Q. Well, she would have been in a better position to know the truth or falsity of what you have alleged in here than you would, would she not?

A. By which you mean does she know about -- Let's put it this way, Laurel knows what she knows, and I know what I know. So there are certain things undoubtedly which she told me which she may have first-hand knowledge of. If that's what you are referring to, then, yes.

Q. Now, you say that the purpose of this "mission all clear" was to allow Mr. Hubbard to return to Gilman Hot Springs; is that your statement?

A. Yeah.

Q. Now what's the basis of that statement?

A. Well, there was a -- the -- I saw a -- projects which had all clear; I was told by Norman Starkey and by Terri Gamboa about the all-clear date; I was informed by Lola Rossouw about the readying of the offices at Gilman Hot Springs in preparation for the all clear.

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Q. What is the all-clear date, Mr. Armstrong?

A. The all-clear date was the date when Mr. Hubbard could be signaled that it was all clear. In other words, the litigation had been taken care of, and he could return home.

Q. What is that date?

A. I don't know what it is anymore. Originally it was stated as whatever I stated there, sometime in early 1981, then later in December 1981.

Q. What's the source of your statement here that the all-clear date was October '81 and then later in December '81. What's the source?

A. The first person who told me about it was Terri Gamboa.

Q. Your former wife?

A. Yes.

Q. Who was the second person?

A. I think Julia Watson.

Q. Who else has told you about that?

A. Other people have referred to it. Sue Anderson, Lola Rossouw, who I mentioned.

Q. Who was it that told you the purpose of "mission all clear" was to permit Mr. Hubbard to return to Gilman Hot Springs?

A. It was never stated to Gilman Hot Springs, but it was stated so that it was all clear for him to come home.

Q. Isn't that a conclusion on your part, Mr. Anderson, that --

MR. LOGAN: There's no Mr. Anderson.

MR. JOHNSON: Mr. Armstrong. Excuse me.

Q. -- that the purpose of the all clear was to go to Gilman Hot Springs? Isn't that merely a conclusion on your part?

A. Well, again -- see -- yeah. It is in many ways, and, again, it could have been part of a Hubbardian scam or some other scam to have a group of people working on the offices in anticipation of Mr. Hubbard's arrival when in fact Mr. Hubbard didn't even exist. Maybe he was dead. However, the work was being done.

I was contacted about it. I went out and viewed the work that was being done on the studio office, and I was informed that it was being done in anticipation of Mr. Hubbard's arrival, and it would be sometime in December 1981.

Q. Do you recall your interview on the ABC Television "20/20" program?

A. Yeah.

Q. Do you recall anything you were asked about your opinion as to whether Mr. Hubbard was living or dead?

A. Yes.

Q. What opinion did you give on national TV on that subject?

A. I don't know. I just don't know.

Q. You don't recall your answer?

A. I said I don't know.

Q. Well, do you have an opinion as to whether he is living or dead?

A. I don't know.

Q. In the first sentence of your Paragraph 28, it is your understanding that Mr. Hubbard is still residing in and intends to continue to reside in Southern California. Do you know about that sentence now?

A. Well, could be. When was this thing authored? Sometime back in October?

Q. This was authored in October, and the "20/20" public dissemination of your interview occurred after October, did it not?

A. Yeah.

Q. Well, is your opinion now changed as to the first sentence of Paragraph 28?

A. Now, you have to get some things -- it could be. Certainly there appeared to be an awful controversy which there wasn't back in October.

Q. Well --

A. I think you may have your dates a little mixed up here.

Q. Perhaps I do. See if you can straighten me up. You were interviewed on "20/20" on what date?

A. Yes. And what is the statement that you are stating that I made on "20/20" first?

Q. I'm not making a statement. I'm asking you what you said. I saw you. I know what what you said, and I'm asking you. I'm not giving a deposition.

When were you interviewed by "20/20"?

A. In July or August.

Q. All right. And at that time was there a question in your mind as to whether Mr. Hubbard was living or dead?

A. Not at that time.

Q. Did you make a statement which would indicate there was a question in your mind?

A. I don't believe so.

Q. On October 19th, '82, was there any question in your mind as to whether Mr. Hubbard was living or dead?

A. I never considered it up to that time.

Q. Well, since that time, have you come to question whether Mr. Hubbard is living or dead?

A. Yeah, I think there's a tremendous controversy around that subject.

Q. I'm asking you what's in your mind. You are giving your opinion in Paragraph 28. I'm asking: Now in your mind is there an opinion as to whether he's living or dead?

A. Right now?

Q. Yes, sir?

A. I just don't know. I don't know.

Q. Do you believe that he's dead?

A. That's a -- that's a -- how could I possibly say that? The only people who know are the people who are with L. Ron Hubbard -- whether he's alive or dead.

Q. Well, the reason I ask that question, if he is dead, then that would alter your first sentence of Paragraph 28, would it not?

A. Oh, undoubtedly. As soon as I know that he is dead, that definitely will alter that statement.

Q. Well, see, what I'm trying to ask you, you give in Paragraph 28 your understanding or your opinion -- call it what you may -- that Mr. Hubbard is still residing in and intends to continue to reside in Southern California. That was your opinion which you stated as of October 19, 1982.

And now I want to know your opinion on February 9th, 1982, whether you still have that same opinion?

A. It's very difficult to say now. He may be dead.

Q. So what you are telling me, it was firm in your opinion as to whether he was residing in Southern California back in October. You are not as firm in your opinion now?

A. I don't know, I have a lot more -- there's a lot more doubt, a lot more doubt than there was then.

Q. In your first sentence of Paragraph 28, you were merely speculating on what you thought he might be doing, were you not?

A. I wouldn't say that it was total speculation because it was based on considerable evidence that, that a great deal of expense, a great deal of manpower was going into the renovation of these properties in anticipation of his return.

Now, I do recognize the possibility that all that work might be being done to make the people there think that L. Ron Hubbard is alive when in fact he's dead. There's any number of scams which could be carried out. So I recognize that fact.

But my understanding then was when I saw this work being done, I really thought that there really is a conviction on the part of those people doing the work and on the part of the organization that L. Ron Hubbard was coming back, and it was my understanding that he was going to be residing there. Now -- now it's difficult to say. It really is.

Q. I want to know if I can rely on your statement in the first sentence of Paragraph 28 that you believe that Mr. Hubbard is still residing in Southern California?

A. I'll put it this way. When I wrote this thing this October, I believed he was residing in Southern California.

Q. What do you believe today on February the 9th, 1983?

A. I don't know. He could have "fled" again and be in Timbuktu, I just don't know.

Q. Let's go to Paragraph 29.

I guess your allegations in the first sentence of 29 we've pretty well covered, did we not, in connection with my questions about other paragraphs?

A. Uh-huh.

Q. Your answer is "yes"?

A. Yes.

Q. Let's not take any more time needlessly unless you have anything else to offer. Do you have anything else to offer other than what you have told me?

A. No.

Q. I don't know if I asked you specifically "about the people who were considered his personal staff all reside in Southern California." Here again that's conclusionary, is it not?

A. Well, they -- yeah.

Q. All right, let's go to 30.

(Off the record.)

BY MR. JOHNSON:

Q. In the second sentence of Paragraph 30, Mr. Armstrong, you talk about personal knowledge of the operations of the Guardians Office concerning Mr. Hubbard's purchasing an estate in Ireland. What's the date of that operation that you described in that Paragraph 30?

A. I believe it was -- I believe it was '76.

Q. The reason I ask that is because in the next sentence of Paragraph 31 you say "also in '76." Does that mean that the preceding paragraph concerned 1976?

Do you see what I'm talking about? Can you read down in Paragraph 31.

A. "This was done to cover up the fact that Mr. Hubbard was planning to establish a residence -- "

Q. Next, the first clause of Paragraph 31, you say "also in 1976." Does that confirm your recollection that the Ireland story was in '76, or was it earlier? That's my question.

A. I don't recall -- I do recall -- to the best of my recollection, it was in 1976, and I became aware of it around the time that, you know, plans were being --

Q. When did you become aware of it?

A. In early '76.

MR. JOHNSON: Do you have any inquiry?

MR. MAGNUSON: No, I have no questions.

EXAMINATION

BY MR. LOGAN:

+ Q. Mr. Armstrong, I'm Walt Logan. I represent plaintiffs in this case, and I'd like to ask you a few questions.

First of all, how long were you in Scientology?

A. I got into Scientology in 1969 and joined the Sea Organization in the beginning of 1971.

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Q. And you were in the Sea Organization from the the beginning of 1971 until the time you left Scientology?

A. Yeah.

Q. I'm going to be touching on some areas or asking you some questions on some areas that Mr. Johnson has inquired upon. I'm not going to purport to ask questions on all of the areas, so if I appear to be jumping around and I confuse you, please let me know.

A. Okay.

Q. At one point during your examination you discussed drills to handle process servers that might appear with process to serve upon Mr. Hubbard or Mrs. Hubbard. What period of time did that sort of drill cover?

A. Initial drills that I did like that were on the ship, and I was in the Port Captain's Office a great deal of that time, and I did that type of drill then.

Specifically, on handling process servers, that was done in Dunedin and La Quinta and Gilman Hot Springs. So that covers an area from 1976 through 1980.

Q. By way of example, if I were to appear, for instance, and to announce that I was a U.S. Marshal and I had summons to serve upon L. Ron Hubbard, and you were on guard duty, what would be your response, then, pursuant to those drills?

MR. JOHNSON: I object to that as immaterial.

THE WITNESS: My response would be a denial that I knew L. Ron Hubbard or a denial that Mr. Hubbard resided at that property. I would refuse to accept any papers, and I would immediately notify whoever the designated person was so that the alert could be given.

BY MR. LOGAN:"

Q. What post or position would that designated person hold?

A. In La Quinta there was an immediate notification by walkie-talkie which alerted people on various parts of the property. But the immediate people to be notified would be the CMO personnel who were with him 24 hours a day.

Q. "Him" being L. Ron Hubbard?

A. Yes.

Q. In your response you indicated that would have been given irrespective of the fact that L. Ron Hubbard would have been on the property at the time?

A. Yes.

Q. I'll show you this working copy of the affidavit, which is a copy of what I filed, with the certificate of service dated November 24, at Page 21.

Do you recognize that to be your signature?

A. Yeah, it's mine.

Q. And the printed portion, the "19" and the "October"; is that in your hand?

A. Yes.

Q. And was that document signed after the final draft was completed?

A. Yeah.

Q. You mentioned during some of the questioning by Mr. Johnson "coding" and "decoding" of messages. What was the purpose of coding and decoding messages?

A. Secrecy. Mr. Hubbard had apparently a fear of being located or found by government people. And he operated a massive intelligence operation, and part of the action of which was the gathering of information on individuals and the operations against individuals, and for this reason there was a very high security put on all telexes.

There were various degrees of security and coding which went on. The Guardians Office had its own code at one time which I worked with coding and decoding, and L. Ron Hubbard had his own code which I worked with coding and decoding, and organizations had their own codes which I used coding and decoding.

And the total reason for the use of secret codes was the keeping hidden, is being done, or operations involved in -- operations that the organization, being Mr. Hubbard, Mrs. Hubbard, the Guardians Office, et cetera, were involved in.

Q. You mentioned during the examination by Mr. Johnson that Mr. Hubbard was concerned about getting the Flag land base going. That was in Dunedin, when he was in Dunedin?

A. Well, Mr. Hubbard, in his own words, master-minded the whole Flag land base project, initially sending missions from the ship in 1975 to Florida to locate a property and then arranging the movement ashore of himself, his personal staff, and the non-U.S. staff into the motel accommodations in Daytona Beach and operating there from their missions to set up the Clearwater premises, both the Ft. Harrison and the Bank of Clearwater Building and the Dunedin and King Arthur's Court complex.

Mr. Hubbard operated all those missions during all that time and organized the United Churches plan and ran the Guardian Office mission -- Lindy Allen, Duke Snyder, and that bunch.

Q. What was your position during that time period?

A. At the beginning of that when it all began, when I first learned about it, I was on the ship and I was the intelligence officer in the Port Captain's Office on

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board the ship.

Then when we came to Daytona, I was for a brief period in B-1 Intelligence Bureau in Daytona Beach, and then I operated mimeograph machines for a couple of days, and then I was sent to King Arthur's Court to set up that -- that complex, get a telex machine installed and get the rooms established and set up an external communications bureau and offices and facilities.

So I was during that time -- and then until Mr. Hubbard left in, I believe it was March of 1976, I was the Director of Communications and the Deputy LRH External Comm Aide, so I observed telex and mail communications to and from Mr. Hubbard to the organizations and the Guardians Office in Clearwater, most of which during that period having to do with the establishment of the Flag land base and the -- handling the legal, press, and public relations and intelligence involvements which the organization had -- was in at that time.

Q. Did you have occasion to observe the relationships of Mrs. Hubbard in her position as Commodore, Staff Guardian, or as Controller with Mr. Hubbard on an organizational basis?

A. Yeah. I knew that -- I observed communications going from the Guardians Office via Mary Sue to L. Ron Hubbard, and knew that he was ordering directly into the Guardians Office, and they were reporting directly to him; and I observed international programs and projects going to Mr. Hubbard either via Mary

Sue or cc-copied to Mary Sue during that period.

Q. And those communications went to Mr. Hubbard?

A. Yeah.

Q. In the chart of command structure of Scientology, was it a normal practice for Mr. Hubbard to communicate with his staff through briefings given by a member of his personal staff?

A. Yeah.

Q. As opposed to Mr. Hubbard personally coming out and giving the briefings himself?

A. Yeah, that was very much the case. Following -- even back on the ship he only gave, to my recollection at a broad staff briefing, one during the period in which I was on the ship, but his staff or representatives gave many briefings during that period.

Q. In the chain of command or chart of command of Scientology, were those briefings understood by staff members as having the authority of L. Ron Hubbard?

A. Yeah. Generally it would be stated that "an LRH order has come down," or, "This is an order from LRH," or "This is from the boss," or something like that; and everyone involved knew that that was a LRH order which had to be carried out, that the -- this was being done on his order.

Q. Did Mr. Hubbard always have access to a telex machine wherever he was located during the time that you were around and about him?

A. Let me think. Well, yeah, during the ship period, and that goes from 1971 through 1975, he definitely had. He would not personally operate the telex machines because during much of that period we would arrange a telex machine either in the office of the ship's agent in whatever port we were or a local public one. Occasionally we had telexes which were installed on board during some of those periods, but these were always line telexes and never the wireless.

And when we came ashore, to my recollection, he did not have one in his offices or his living quarters in Daytona Beach, but that, again, his telexes were handled by a unit which was established in an adjacent motel where I lived. And also Dunedin he had a telex right adjacent to his office.

In -- in Washington my recollection is -- and this is just what I was told by David Rossouw and Mike Douglas. Well, I know this to be a fact because I actually relayed communications to the Washington, D.C. telex machine, and the Guardians Office facilities were used in Washington, D.C. So while he was in D.C. he set up a mission involving David Rossouw which went into the Washington, D.C. mission -- or Washington, D.C. organization as if on a mission and used the organization telexes -- telex machines for relay to me.

In Culver City, also, I set up a telex machine operation with a -- with a phonetic coupler. So we used telephone lines at that time, and that went to the Guardian Office in GO US. That was our line of communication. Then the GO US transmitted to Clearwater or internationally.

Then, so -- and then in La Quinta he had a telex machine set up, and in Gilman there was a telex set up.

So, yes, during all of that time except for perhaps a few days out of communication here or there, he had access to or personal control of a telex.

Q. You are familiar with the Scientology term "on lines"?

A. Yes.

Q. Was Mr. Hubbard on Scientology lines during the times covered by your previous answer?

A. Yeah, exactly. Mr. Hubbard was on Scientology lines throughout the whole ship period, throughout Daytona Beach, King Arthur's Court, Washington, Culver City, La Quinta, Gilman Hot Springs, throughout that whole period.

Q. Would you --

A. Barring again a few days where he might be traveling or where for security reasons the amount of communication diminished; for example, when the ship was crossing the Atlantic, then there was minimal communication. When Mr. Hubbard was in -- in New York in 1973, again the communication was minimal, but it still existed.

So when he again was in a position of proximity to organizations, and he felt his security was sufficient, he took over absolute control.

Q. During direct examination you described, and in your affidavit you have described, some rather substantial physical renovations done at Gilman and the various places in that immediate area. Were any of those type renovations performed in Pinellas County at King Arthur's Court?

A. No.

Q. Were any renovations of that type performed anywhere in Florida for Mr. Hubbard?

A. No.

Q. When you went to King Arthur's Court to prepare that complex for Mr. Hubbard, what sort of preparations did you make?

A. We set up a -- a telex unit which was adjacent to an office which he was going to use, and the place was dusted and vacuumed.

Q. There was no new carpet or new floors or painting of the interior or anything of that sort?

A. It seems to me that carpet -- carpet was definitely put in sometime -- I mean I don't know that the place had ever been lived in. My understanding was that it wasn't. To my knowledge, there was never anything done like that.

Q. You mentioned Mr. Boudin and some communications between Mr. Boudin and Mr. Hubbard. Did Mr. Boudin, to your knowledge, ever visit with Mr. Hubbard in Southern California?

A. I saw in communications that a visit was planned and that it was carried out.

Q. Describe those communications, please.

A. These were communications L. Ron Hubbard gave to Pat Broeker to set the -- there was a little project on bringing Boudin out to the La Quinta property, and then there was subsequent communications from L. Ron Hubbard to Mary Sue Hubbard having to do with the results of the meeting.

Q. Do you recall the communication concerning the results of the meeting?

A. Oh, the only -- the only one which I recall which was either a result of the meeting or the result of other correspondence was, again, a briefing that L. Ron Hubbard gave to messengers on handling Mr. Boudin. And what I recall specifically had to do with the funding of Mary Sue Hubbard's defense, and it had to do with -- there was a statement that -- that Mr. Hubbard could sue the organization if they did not pay for her defense; that justified any impropriety in his not paying. That was my -- that's the gist of it.

Q. You mentioned a project for Mr. Boudin to come to the property. What do you mean by a "project"?

A. It was a project laying out the -- how he would be picked up and brought to the property, and who was to be responsible for taking care of the various setups which had to be done.

There was a -- there was a high degree of security given to this operation in bringing Mr. Boudin to the property, and a number of the targets of the project involved the security of bringing him to the property.

Q. Approximately when was that?

A. I believe the beginning of 1978.

Q. In Paragraph 6 of your affidavit you make reference to L. Ron Hubbard writing that he had -- or was in Sparks, Nevada. When did you see that communication?

A. I saw it when I -- during the period when I was the LRH Archivist In-Charge of his personal archives.

Q. That would be in 1980, portions of --

A. '81.

Q. Those were documents authored by Mr. Hubbard?

A. Yes.

Q. How do you know they were authored by Mr. Hubbard?

A. They were in his personal archives. They were -- I don't know if any of them were signed, but they were responded to by Mary Sue, who signed the return correspondence.

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Q. Where were those archives kept?

A. In Cedars Complex in Los Angeles.

Q. That's a Scientology facility?

A. Yeah.

Q. During discussion on Paragraph 8, you referred to a comment being made around the Rifle property that "the Lady" is here, referring to Mary Sue Hubbard, and that extra guards were posted at that time. Those extra guards were not for the personal security of "the Lady," Mrs. Hubbard, were they?

A. It was never my understanding that they were. It was simply that the likelihood was that she may have led the Feds to Mr. Hubbard or someone else to Mr. Hubbard. That was my understanding of why the guards were doubled. No guards returned with her, so that's all I can answer.

Q. In Paragraph 15 of your affidavit, you mention a time period, all of 1979 until March of 1980, and in questioning by Mr. Johnson, you indicated that you were in the RPF for portions of early 1979. During the remainder of that time period referred to, all of 1979 and until March 1980, in other words, the period you weren't in the RPF, where were you?

A. At Gilman Hot Springs. It should be understood that while I was in the RPF I was also involved in the purchasing material for Mr. Hubbard's residence and offices at Gilman. So as a result of that, I had occasion to go into Hemet, and it was during this period that I learned the existence of the X property.

Q. In the second sentence you state: "He did not move into the house at Gilman Hot Springs because early in 1979 its renovations was not complete...."

Taking that portion of the sentence, is that based upon your own personal knowledge?

A. Yeah.

Q. And then continuing that sentence: "...and later it was considered unsafe for him to live on the property, its cover having been quote, 'blown', end quote, in Riverside, California, and Florida newspapers."

Is that statement based upon your observations at the time that you were located in and around the Gilman property?

A. Yeah. On the first part, all of the RPF worked day and night during that period, worked very long hours, and we went for a great deal of that time without study, and the reason for that was the great push which was being put on.

We were told that Mr. Hubbard would want the property by the beginning of April. So we did everything in our power, including sacrificing study and auditing time, in order to make that possible. Then later in the year we were then informed that it can't happen now because of the security matter; but prior to that, a tremendous effort was made to have it ready in April for him. That was the date which was given us by Kima Douglas.

Q. How did you come to be informed that it was not possible for him to come to the property?

A. I was briefed by Kima and --

(Off the record.)

And I was -- attended briefings of staff at Gilman Hot Springs, and I was very much aware of the fact because of the -- being briefed for the security measures which had to be taken whenever Mr. or Mrs. Hubbard did come to the property. So I was kept very briefed by my seniors, by the CMO, and by other executives, and I was very aware of the situation.

Q. When Mr. Hubbard did not show up to move into the property, did anyone else occupy those premises?

A. No.

Q. You mentioned during questioning by Mr. Johnson the ceremonial offices that you understand are in some Scientology facilities for Mr. Hubbard. Were these efforts you were working on for a ceremonial office as you understood the term "ceremonial office"?

A. No. These offices contained L. Ron Hubbard's actual materials, L. Ron Hubbard's actual library. All of his materials in storage were on this property. There was a great difference between the offices being set up here and offices in organizations which are just kept as symbolic offices.

Q. During discussion with Mr. Johnson at Paragraph 28, you were discussing Norman Starkey and your belief that he was a CMO person?

A. Yes.

Q. Did Mr. Starkey present himself in such a manner that he convinced you that he was a CMO person?

A. Yes.

Q. And what you were explaining to Mr. Johnson was that you did not go back into his personnel or staff file to establish the bonafides as to whether he was CMO or not?

A. Yes.

Q. It was your perception that he was CMO as it is your perception today that I am a lawyer, and Mr. Johnson is a lawyer, even though you haven't checked us out or checked with the bar association; is that correct?

A. That's correct. Additionally, I saw his name listed on a roster or a crew list as CMO Missionaire, and there was only his name and Neville Potter's name, and all other Missionaires on the planet anywhere were not listed. This was amongst -- on a CMO crew list. So I took it they're being CMO members and not any other staff who could be rung for the purpose.

Q. You mentioned in response to some questioning by Mr. Johnson that there could be a possibility that the return of Hubbard to these facilities that you were working on could have been a scam to perpetuate some false status or story about Mr. Hubbard.

Did you believe at that time that you were taking part in a scam?

A. No.

Q. Do you know the amount of money that was spent on the rejuvenation or alteration of the properties that you've described in your affidavit?

A. I would say over a 100,000.

Q. Upon what do you base that answer?

A. I did a great deal of the purchasing of the materials, fixtures, appliances which went into the renovation of the residence and the several office spaces.

Q. In regard to Paragraph 29, the last sentence reads: "Additionally the people who were considered Mr. Hubbard's personal staff all reside in Southern California."

Mr. Johnson asked you if that sentence wasn't conclusionary on your part. Is that sentence based upon your conclusion as a result of your firsthand observations?

A. Yeah. Throughout that period up till 1981 and in fact later, I knew that his personal staff were all in Southern California. There were a few of them in Clearwater in 1980, and by 1981 they had all moved out to Southern California.

Q. Going back to the telex machine back in Dunedin, when you dispatch a message on a telex, how is it you can tell where the message is dispatched to?

A. Well, there's a routing at the beginning of every telex either in the numbering designation which begins the telex which will indicate the source of origination of the telex. For example you might say today's date and then "FLB", which will mean it's a telex from Flag land base, as an example. So that any recipient knows that goes back to the FLB.

And then it would have following that originating designation it would then have a routing. So it would go, for example, "LRH", or whatever code is being used, "R", and then it might cc various people. So it will either go via people or cc them, and so you can tell from a telex who the recipients are.

Q. During the briefings concerning dealing with potential process servers, was there any mention made as to why there was an interest in insulating Mr. Hubbard from the service of process?

A. I don't know if I was ever told. It was just assumed that these people were part of the evil conspiracy out to get him.

Q. During the time that you were assigned to RPF, did you remain loyal to Scientology and to L. Ron Hubbard?

A. Yeah.

Q. You in fact worked your way out, made the amends necessary to get out of the RPF and back in regular standing or status as a member of Scientology; correct?

A. Yeah.

Q. After you left Scientology, you continued to assist in helping the biography of Mr. Hubbard, did you not?

A. Yes.

Q. These pictures that you talked about, that were picked up by Scientology personnel, of Mr. Hubbard, how many pictures were there?

A. 30. These included negatives and prints. So for most of them there was both a negative and a print and they were on -- they were attached to sheets of paper and accompanied a description of each one of the photos, the circumstances surrounding the photo, what was occurring, date of the photo, who the individuals in the photos were. And these statements were signed, one by a Jim Dincalci and one by Kima Douglas.

Q. Was there anything negative about those photographs? By "negative" I mean anything about the photographs that were disparaging to Scientology or L. Ron Hubbard?

A. They may have been interpreted that way. My opinion is that the reason that they were stolen was that in -- they indicate that in fact in the beginning of 1980, L. Ron Hubbard was very much in communication with Org staff members.

And at that time there were lawsuits pending which had named L. Ron Hubbard, and there were attempts at the present time being made to have Mr. Hubbard served, and these photos offered fairly concrete evidence that Mr. Hubbard was, indeed, in communication and in fact living with organization personnel and not just one or two but about ten, and the organization stole them, knowing that they had made statements in legal arenas to the effect that they did not know where L. Ron Hubbard was and had no way of contacting him; so they had to steal these photos.

Q. Tell me as best you recall who were included in that group of people in the photos with Mr. Hubbard?

A. David Mayo, Merle Mayo, Mike Douglas, Kima Douglas, John Brousseau, Clarisse Brousseau. That's all I recall.

Q. Do you know a Philip Park?

A. Yep. He was with the Guardian Office at FLAG.

Q. Do do you know whether Mr. Park was ever in the presence of Mr. Hubbard, if you know?

A. I don't know.

Q. Do you know one way or the other as to whether Mr. Whitman, Kenneth Whitman, was ever in the presence of Mr. Hubbard?

A. I don't know.

My guess on the first one on Mr. Park is that he --

MR. MAGNUSON: Objection. I don't think we are permitted to have a guess.

THE WITNESS: Okay.

BY MR. LOGAN:

Q. Go ahead. We're here in discovery, what's your best information?

A. That Mr. Park was on board the ship with me for a great period of time. It seems almost impossible that he was not during that period in Mr. Hubbard's presence. He certainly was within 50 feet at any given instant.

Q. The people that are in the CMO portion of Scientology, do they interact? Are they in contact with the Church of Scientoloy in California?

A. Yeah.

Q. On a regular basis?

A. Yes.

(Off the record.)

BY MR. LOGAN:

Q. Mr. Armstrong a person such as Mr. Hubbard is obviously known by more people than he knows; in other words, more people recognize him than he would recognize.

If you know, did Mr. Hubbard know you by sight?

A. Yeah.

Q. Did he know you by name?

A. Yeah.

Q. He called you by name?

A. Yeah.

Q. What about Mrs. Hubbard?

A. Yeah.

Q. Have you had an opportunity to attend a deposition of Mrs. Hubbard?

A. Yes.

Q. And hear her testify?

A. Yes.

Q. Did she testify on subject areas concerning the relationship of Mr. Hubbard to Scientology? If that was a subject matter; if it wasn't, just tell me.

A. I don't -- I don't recall that specific thing coming up.

Q. If Mrs. Hubbard testified either in deposition or by affidavit that Mr. Hubbard resigned any active participation in Scientology in the mid-sixties, would that be a truthful statement?

MR. JOHNSON: Is this material to this deposition?

MR. LOGAN: I think it is, Paul, he seems --

MR. MAGNUSON: Mrs. Hubbard has testified. It's part of the record. What's the purpose of examining Mr. Armstrong about something he attended? Maybe you could explain.

MR. LOGAN: Let me start again since we've kind of lost the train.

Q. If Mrs. Hubbard testified either by affidavit or deposition that Mr. Hubbard went into semi-retirement and went off Scientology lines in mid-'65, would that be a truthful statement based upon your involvement and knowledge of Scientology?

A. No, it wouldn't.

MR. LOGAN: That's all I have.

MR. JOHNSON: Mr. Magnuson, do you have any questions?

MR. MAGNUSON: No questions.

FURTHER EXAMINATION

BY MR. JOHNSON:

+ Q. I do have some questions, Mr. Armstrong.

A. Yes.

Q. You were asked about a drill concerning what to do if the process server arrived, and Mr. Logan asked you a hypothetical question about if a U.S. Marshal should arrive on the scene, what would you do, and you gave a response to that question. Let me ask you something in this relationship.

Did you ever receive a memorandum of law from any of the attorneys for the Church of Scientology of California concerning what steps you should take if you were approached by a process server?

A. Run that by me. A memorandum of law?

Q. Yes, setting up a suggestion as to what steps you should take if a process server approached you while you were on duty?

A. No.

Q. Were you aware of a memorandum in existence which advised all the Scientologists that in no case should they obstruct justice or any U.S. Marshal?

A. No.

Q. You are not aware of such a memorandum in existence?

A. No.

Q. Were you ever told by anyone to obstruct a U.S. Marshal?

A. I was never told to obstruct a U.S. Marshal. I was told and briefed on the handling of process servers, and we were drilled on how to not accept service, to not allow them on the property, to alert people so that Mr. Hubbard could make a getaway; we were instructed to not admit that Mr. Hubbard was on the property, to deny knowledge of Mr. property -- Hubbard, that sort of thing.

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MR. JOHNSON: Excuse me. That's all.

MR. MAGNUSON: Actually I have one question if I might.

THE WITNESS: Yes.

EXAMINATION

BY MR. MAGNUSON:

+ Q. Mr. Armstrong, you testified, or you mentioned, having seen communications regarding Leonard Boudin's visit to the La Quinta property. Do you have copies of those communications?

A. No.

Q. Do you know where copies are located?

A. In archives, yes.

Q. There are copies in the archives?

A. The originals are in the archives.

Q. Do you know whether there are any copies of these communications presently under seal --

A. I don't know.

Q. -- in the case of Church of Scientology vs. Armstrong?

A. I don't know.

MR. MAGNUSON: That's all.

FURTHER EXAMINATION

BY MR. LOGAN:

+ Q. Mr. Armstrong, in relation to the briefing on handling process servers, I used the example of a U.S. Marshal. Did the briefing cover any process server, be it a U.S. Marshal, private investigator, sheriff's official, anybody trying to serve process on Mr. Hubbard?

A. Yes.

Q. That briefing came from within the Scientology network as opposed to from some lawyer; correct?

A. Yes. This -- there were drills which were done, and there were Banda machine instructions which we followed for the drills, and this was in both La Quinta and Gilman Hot Springs where I participated in drilling. All work stopped and we came into the dining room, and we participated in drills to be done and on how to handle process servers.

Q. Explain the drill. What physically went on during the drill?

A. One person pretended to be a process server, and one person pretended to be the guard on duty or the organization staff member, and the person approached; and part of the drill was just handing the document, and the guy would refuse to take it, kick it. (Indicating.)

Q. Make his hands not available?

A. Exactly. Part of the drill was if anyone approached and said, "Do you know L. Ron Hubbard?" then one would answer something like, "Who?" or "No, never heard of him." Or if they said, "Does L. Ron Hubbard live here?" we were instructed to say, "Oh, Norton Karno owns this house." Something like that.

Q. Did these drills cover members of the news media?

A. It covered news media, authorities, police -- anyone who could be approaching the property. The idea was to not accept service and to delay long enough so that Mr. Hubbard could make his exit.

Q. Did the drill in any way address whether or not you give your name to the member of the press or the process server?

A. Definitely in dealing with the press. Dealing with -- there were various drills. There was how to handle the press; there was how to handle process servers; there were -- there were Shore story drills in which you were drilled on the Shore story for the operation. And for the press you certainly didn't give any name. For the authorities you did give a name. You often were drilled in how to give a slightly phony name which could not later be shown to be a lie or a false name. All of us on those properties had phony names.

For example I went by at one time "David Armstrong," and in this way I could always say, "Oh, well, it's just my middle name. I use my middle name." But the fact is I never used my middle name, but this was part of the operation. It was one of the things which one was assigned, or one took an "aka" we called it. "What was your aka?"

Well, I had an aka of David Armstrong, and I built up phony documentation using that aka. So I began with writing myself a letter, getting a Gemco card and then getting a phony library card, all using "David

Armstrong," and in that way I would at least have some identification which I could show in a pinch, and it was a phony identification. But if it ever came down to do it, it looked physically legitimate so that I was not caught in any schemes.

So there were these various ways in which one was instructed in, briefed in, drilled in, for handling the authorities, the press. The press, you just didn't tell them anything. You just tell them to get their ass off the property, provided that, as in the case of Gilman Hot Springs, the cover for the property was already blown.

If it wasn't already blown, then you had another scam. Then it was just, "Oh, I'm such and such person. Wait here. I'll get you to talk to this guy." And he would come and tell him this is actually Western States Scientific Communication Company and so on.

So it's lots of drills, lots of scams, lots of levels of deceit.

Q. This briefing to cover process servers covered both L. Ron Hubbard Hubbard and Mary Sue Hubbard?

A. I don't believe so. Mary Sue Hubbard did not actually live on the properties during those periods. When I arrived at the end of 1977, she was just leaving.

Now it did, did back sometime previously back in Dunedin where, again, we all were briefed on how to handle process servers. But later on it was only Mr. Hubbard because Mrs. Hubbard wasn't there.

MR. LOGAN: Thank you.

MR. JOHNSON: You want to discuss reading and signing?

MR. LOGAN: I have no preference.

MR. JOHNSON: Mr. Armstrong. You are familiar with depositions. Do you you want to read and sign this, or do you want to waive it?

THE WITNESS: No, I'll read and sign it.

MR. JOHNSON: You need to get his address do you not?

MR. MAGNUSON: We will stipulate to your signing it under penalty of perjury rather than in the presence of a notary.

(Off-the-record discussion.)

MR. MAGNUSON: Shall we stipulate that if the original is not signed and returned within 30 days, that a copy can be used in lieu of the original with the same force and effect as if the original had been signed?

Is 30 days --

MR. LOGAN: I think it would be with the same force and effect if he had waived because if he doesn't sign by 30 days, he would have in effect waived.

MR. JOHNSON: That's good enough.

THE WITNESS: 30 days from when?

MR. MAGNUSON: From the time your counsel receives it.

MR. JOHNSON: By Contos & Bunch?

THE WITNESS: Yes.

MR. MAGNUSON: We're through.

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) ss.

I, Ruth Persky, C.S.R. #5673, a Notary Public in and for the County of Los Angeles, State of California, do hereby certify:

That prior to being examined, the witness named in Volume II of the foregoing transcript, GERALD ARMSTRONG, was by me duly sworn to testify the truth, the whole truth, and nothing but the truth.

That said transcript was taken before me at the time and place therein set forth and was taken down by me in shorthand and thereafter transcribed into typewriting under my direction and supervision, and I hereby certify the foregoing transcript is a full, true, and correct transcript of my shorthand notes so taken.

I further certify that I am neither counsel for nor related to any party to said action nor in anywise interested in the outcome thereof.

IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed my official seal this 23nd day of February 1983.

Ruth Persky
Notary Public in and for the County
of Los Angeles, State of California

OFFICIAL SEAL
RUTH PERSKY
NOTARY PUBLIC - CALIFORNIA
LOS ANGELES COUNTY
My comm. expires JUL 19, 1985